

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

April Baylis,

Plaintiff,

V.

**Red Lion Group Inc., a corporation
of the State of Pennsylvania,**

Defendant.

C.A. No.:04-1462 KAJ

Trial by Jury Demanded

MOTION FOR EXTENSION OF TIME

1. Defendant, Red Lion Group, Inc. filed a Motion for Summary Judgment on August 5, 2005.
2. Plaintiff's answer to such motion was originally due on August 19, 2005.
3. Counsel for Plaintiff has been in the hospital caring for his daughter for the past week.
4. Doctors have not been able to diagnose her and there is currently no discharge plan.
5. Because he has been with his daughter, Counsel for Plaintiff has been unable to secure the needed affidavits and due to necessary research in order to properly prepare for Plaintiff's answer to Defendant's Motion for Summary Judgment.
6. Counsel for Plaintiff called Counsel for Defendant requesting an extension to answer his Motion for Summary Judgment.
7. Counsel for Defendant is agreeable to an extension to answer his Motion for Summary Judgment until August 26, 2005.

8. Due to anticipated hospital transfers in the upcoming days, Counsel for Plaintiff requests an extension to August 29, 2005 to answer Defendant's Motion for Summary Judgment.



Bayard Marin
The Law Offices of Bayard Marin
521 West Street
Wilmington, DE 19801
302-658-4200
Attorney for Plaintiff

Dated: August 19, 2005


IN THE UNITED STATES DISTRICT COURT
FOR THE DISRTRICT OF DELAWARE

April Baylis,	:	
	:	C.A. No.:04-1462 KAJ
Plaintiff,	:	
	:	
v.	:	Trial by Jury Demanded
	:	
	:	
Red Lion Group Inc., a corporation	:	
of the State of Pennsylvania,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I, Bayard Marin, Esquire, hereby certify that on this 19th day of August 2005, that I caused two true and correct copies of a Motion for Extension of Time to be served by electronic filing upon the following counsel of record:

Norman H. Brooks, Jr., Esquire
Marks, O'Neill O'Brien & Courtney, P.C.
913 North Market Street, Suite 800
Wilmington, DE 19801


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Attorney for Plaintiff

Dated: August 19, 2005